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Of Attorneys for Plaintiffs Thomas Glenn and Patsy McKinney

**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**

THOMAS GLENN; and PATSY  
McKINNEY,

Case No.: 11-CV-00402-KI

Plaintiffs,

AFFIDAVIT OF TRAVIS J. MAYOR IN  
SUPPORT OF PLAINTIFFS'  
MEMORANDUM OF LAW IN  
RESPONSE TO DEFENDANT CITY OF  
PORTLAND'S MOTION FOR PARTIAL  
SUMMARY JUDGMENT

v.

CITY OF PORTLAND, a Public body,

Defendant.

STATE OF OREGON            )  
                                  ) ss.  
County of Multnomah        )

1. I, Travis J. Mayor, being first duly sworn, depose and say that I am one of the attorneys for plaintiffs Thomas Glenn and Patsy McKinney. I make this Affidavit based upon personal knowledge.

2. Attached to this affidavit as Plfs' Exhibit 1 is a true and correct copy of Defendant's Answer and Affirmative Defenses to Plaintiffs' Third Amended Complaint. AFFIDAVIT OF TRAVIS J. MAYOR IN SUPPORT OF PLAINTIFFS' MEMORANDUM OF LAW IN RESPONSE TO DEFENDANT CITY OF PORTLAND'S MOTION FOR PARTIAL SUMMARY JUDGMENT

3. Attached to this affidavit as Plfs' Exhibit 2 is a true and correct copy of a document produced to me during discovery by defendant's attorney, which purports to contain the Portland Police Bureau's Emergency Entries (631.60) policy that was in effect on August 12, 2008. This document is bates numbered: Glenn\_100063 – Glenn\_100064.

4 Attached to this affidavit as Plfs' Exhibit 3 are true and correct copies of excerpts from the deposition of PPB Officer Douglas Matthews taken on August 24, 2011 by Travis Mayor, attorney for plaintiffs.

5. Attached to this affidavit as Plfs' Exhibit 4 are true and correct copies of excerpts from the deposition of PPB Officer Freddie Jackson taken on September 27, 2011 by Travis Mayor, attorney for plaintiffs.

6. Attached to this affidavit as Plfs' Exhibit 5 are true and correct copies of excerpts from the deposition of PPB Sergeant Scott Montgomery taken on August 24, 2011 by Travis Mayor, attorney for plaintiffs.

7. Attached to this affidavit as Plfs' Exhibit 6 are true and correct copies of excerpts from the deposition of PPB Officer Steve Staul taken on August 24, 2011 by Travis Mayor, attorney for plaintiffs.

8. Attached to this affidavit as Plfs' Exhibit 7 are true and correct copies of excerpts from the deposition of PPB Officer Kelly VanBlokland taken on August 24, 2011 by Travis Mayor, attorney for plaintiffs.

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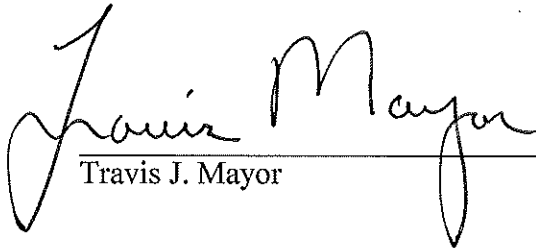
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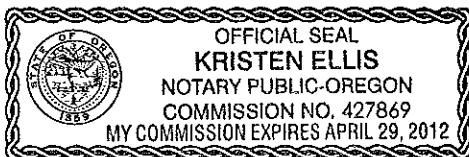
9. Attached to this affidavit as Plfs' Exhibit 8 are true and correct copies of excerpts from the deposition of PPB Sergeant Anthony Passadore taken on August 24, 2011 by Travis Mayor, attorney for plaintiffs.

10. Attached to this affidavit as Plfs' Exhibit 9 is a true and correct copy of relevant excerpts from Magistrate Judge Papak's Findings and Recommendations from the case *Sherrie Carlson Sandau v. John A. Wood, Christopher Cass, and City of Portland*, Case No. CV07632MO, Document No. 115, pp. 1, 30-33, 35-36, signed September 1, 2009.

  
Travis J. Mayor

SUBSCRIBED AND SWORN TO before me this 16 day of January, 2012.

  
NOTARY PUBLIC FOR OREGON  
My Commission Expires: \_\_\_\_\_



**CERTIFICATE OF SERVICE**

I hereby certify that I served, on the date set forth below, the foregoing AFFIDAVIT OF TRAVIS J. MAYOR IN SUPPORT OF PLAINTIFFS' RESPONSE TO DEFENDANT CITY OF PORTLAND'S MOTION FOR PARTIAL SUMMARY JUDGMENT with attached exhibits via the following method on:

William Manlove III  
City Attorney's Office  
1221 SW 4<sup>th</sup> Ave., Suite 430  
Portland, OR 97204  
William.Manlove@portlandoregon.gov

By electronic service via CM/ECF.

DATED this 16th day of January, 2012.

/s/ Travis J. Mayor

Travis J. Mayor

CERTIFICATE OF SERVICE

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